

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Liquidating Debtors.

Chapter 11

Case No. 22-10584 (CTG)  
(Jointly Administered)

**Ref. Docket No. 1000**

**NOTICE OF SUBMISSION OF PROOFS OF CLAIM IN CONNECTION WITH THE  
FOURTH OMNIBUS OBJECTION TO MISCLASSIFIED CLAIMS (SUBSTANTIVE)**

PLEASE TAKE NOTICE that on October 20, 2023, Tanya Meerovich of FTI Consulting, as liquidating trustee (the “Liquidating Trustee”) of the liquidating trust created pursuant to the *Amended, Modified And Restated Combined Disclosure Statement And Chapter 11 Plan Of First Guaranty Mortgage Corporation And Debtor Affiliate* [Docket No. 671-1], and that certain trust agreement dated as of November 4, 2022, appointed in the chapter 11 cases of First Guaranty Mortgage Corporation (together with its affiliated debtor in possession, the “Debtors”), filed the *Fourth Omnibus Objection to Misclassified Claims (Substantive)* (the “Fourth Omnibus Objection”) [Docket No. 1000] with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”). A hearing on the Fourth Omnibus Objection is scheduled for November 27, 2023 at 10:00 a.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that the proofs of claim that are required to be delivered to Chambers pursuant to Del. Bankr. L.R. 3007-1(e)(iv) (the “Proofs of Claim”) have been delivered to the Chambers of the Honorable Craig T. Goldblatt (with all attachments) together

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number in the jurisdiction were: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

with a copy of the Fourth Omnibus Objection. Copies of any Proof of Claim may be requested from the undersigned counsel to the Liquidating Trustee.

Dated: November 13, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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